

Morgan Went
19 Maybon Close, Branxton
morgan.went@me.com
0418 464 048
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Objection to Project: Bluestone Hardrock Quarry Project (SSD-76210271)

Location: Springvale Road, Elderslie (Singleton Shire LGA)

To Whom It May Concern,

I am writing to formally lodge my strong objection to the proposed Bluestone Hardrock Quarry Project (SSD-76210271). As a directly impacted resident living immediately adjacent to the corridor on Maybon Close, I am deeply concerned by the profound, life-altering impacts this massive extractive industry will impose on our community.

The proposal seeks to extract up to 1 million tonnes per annum (Mtpa) over a staggering 30-to-50-year lifespan, generating an estimated 66,000 heavy vehicle movements per year. This does not represent a temporary disruption; it forces a permanent reclassification of Elderslie Road from a peaceful rural-residential corridor into a high-frequency, heavy industrial haul route.

The Environmental Impact Statement (EIS) fails to meet basic standards of adequacy, safety, and procedural fairness. I urge the Department to refuse consent based on the following critical grounds:

1. Failure to Assess Cumulative Traffic Impacts in a Growth Corridor

State Significant Development (SSD) guidelines strictly require a comprehensive cumulative impact assessment, yet the project's traffic modeling treats the corridor as if it were entirely static. The Branxton-Greta-North Rothbury area is currently the highest growth zone in the Singleton LGA. The EIS is fundamentally deficient because it fails to integrate:

- **Radford Park Estate:** 169 existing lots directly on Elderslie Road, plus an approved 162-lot expansion (PP-2022-3868), totaling **331+ residential lots** directly facing the haul route.
- **Huntlee Development:** Approximately 1,200 homes are already built, with clear plans expanding to **7,300 total dwellings**.
- **Infrastructure Conflict:** Transport for NSW (TfNSW) and Council are currently investing public funds into residential intersection infrastructure - including the proposed Rusty Lane roundabout - to support family housing. Running high-frequency, 30-tonne trucks through this exact infrastructure creates an unresolvable policy and safety tension.

A traffic model that assesses a 1Mtpa quarry in total isolation from approved, rapidly expanding residential growth fails the legal and planning standards required for an SSD.

2. Infrastructure Fatigue and Severe Structural Risk to Elderslie Bridge

Elderslie Road is geographically constrained with narrow shoulders, steep grades, and multiple residential access points. The single-lane **Elderslie Bridge** is a critical historical bottleneck.

- **The Fatigue Fallacy:** The proponent relies heavily on a basic "load rating". However, a static capacity rating is completely separate from a structural fatigue life assessment. Subjecting a narrow, single-lane historic bridge to 66,000 heavy vehicle movements annually for decades requires Austroads fatigue design modeling.
- **The Hampden Bridge Precedent:** TfNSW's recent intervention regarding the Hampden Bridge in Kangaroo Valley proved that sustained heavy vehicle loading causes rapid, hidden structural degradation that legacy load ratings fail to predict.

3. Severe Threats to Vulnerable Road Users and School Transport

Elderslie Road almost entirely lacks footpaths, separated cycleways, or modern pedestrian safety protections. Dozens of families and children walk, cycle, and access residential driveways along this exact stretch.

- **The School Bus Overlap:** The proposed haulage hours create a highly dangerous, direct conflict with school bus routes and peak student pick-up/drop-off times.
- With a projected truck frequency averaging **one heavy vehicle every two minutes**, the risk of a catastrophic interaction involving school children or cyclists is unacceptably high. The EIS fails to demonstrate that this risk has been reduced to As Low As Reasonably Practicable (ALARP).

4. Chronic Acoustic Destruction and Corridor-Wide Air Quality Deposition

- **Acoustic Crushing:** Operational noise and heavy downshifting will permanently degrade local health. Descending heavy vehicles will utilise compression and engine braking on the downhill grades immediately adjacent to residential homes, causing highly disruptive, intermittent acoustic spikes that have not been adequately modeled at our residential receptors.
- **Water Supply Risks:** The EIS restricts its air quality focus to the immediate site, ignoring the corridor-wide dispersion of diesel particulates, brake/tyre dust, and road surface abrasion. Because many properties along Elderslie Road rely entirely on harvested rainwater tanks, the continuous settling of toxic industrial dust on residential roofs poses an unmitigated threat to domestic drinking water safety.

5. Devastating Impacts on Local Businesses, Tourism, and Home Equity

The haul corridor directly impacts long-standing local employers and agricultural operators, including **Pierre's Wines** and the **Elderslie Pet Motel**.

- **Pierre's Wines:** Agritourism and cellar doors rely completely on experiential peace and scenic amenity. Flooding the road with heavy haulage directly past their doors during time-sensitive operations like vintage will devastate customer confidence and business viability.

- **Elderslie Pet Motel:** A commercial animal boarding facility is entirely dependent on a low-stress acoustic environment. Sustained engine braking, heavy downshifting, and blasting vibrations present severe animal welfare risks.
- **Private Capital Devaluation:** Families invested in Radford Park and Maybon Close under the promise of a semi-rural lifestyle. Introducing a 50-year heavy haulage route will decimate property values, destroying household equity during an already volatile economic climate.

6. Inexcusable Procedural Unfairness

The community engagement process has been fundamentally flawed. Directly affected commercial stakeholders on the primary haulage route, including Pierre's Wines, were explicitly denied direct access to the proponent's traffic consultant during the preparation phase. A traffic assessment built without on-site consultation with the most vulnerable commercial premises along the route fails the Secretary's Environmental Assessment Requirements (SEARs) for genuine engagement.

7. Macroeconomic Shifting: Taxpayers Funding the Fallout

Every operational and structural failing detailed above carries a heavy financial consequence - none of which will be sustained by the proponent. Instead, the severe cost-of-living pressures and economic climate currently placing unprecedented strain on everyday families are completely ignored by this proposal's financial framework.

- **The Infrastructure Subsidy:** The exponential damage inflicted on local road pavement and the structural remediation required for Elderslie Bridge will vastly outstrip the proponent's token \$1 million annual road contribution. These multi-million dollar lifecycles are set to be borne directly by Singleton Council and State government authorities.
- **Perverse Funding Structure:** Consequently, the local taxpayers who are most severely impacted by the safety risks, toxic dust deposition, noise pollution, and property devaluation of this project are the very people expected to fund its infrastructure enablement and long-term degradation through their rates and taxes.
- **Public Deprivation:** Forcing public agencies to absorb open-ended infrastructure liabilities for private industrial gain will inevitably lead to deferred maintenance of vital public assets elsewhere or trigger Special Rate Variations. It is economically unjust to transfer private operational costs onto public budgets at a time when households are already stretched to their absolute limits.

Conclusion and Clear Legal Precedent

The Department must look to the **Martins Creek Quarry expansion precedent (SSD-6612)**. The Independent Planning Commission refused that project in 2023 on nearly identical road haulage and amenity grounds - a decision strongly upheld by the Land and Environment Court in July 2025. Crucially, the Martins Creek proposal involved *half* the annual tonnage and *half* the operational duration of what is currently being pushed upon Elderslie.

If half the tonnage over half the timeline was deemed completely unacceptable at Martins Creek, the Bluestone Hardrock Quarry Project cannot logically be approved. Private

commercial profit must not be prioritised over public safety, public infrastructure budgets, and the intergenerational equity of our community. I urge the Department to reject this application in its entirety.

Sincerely,

Morgan Went

19 Maybon Close, Branxton NSW 2335